

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SIA HENRY, MICHAEL MAERLANDER,
BRANDON PIYEVSKY, KARA SAFFRIN,
and BRITTANY TATIANA WEAVER,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY,
UNIVERSITY OF CHICAGO, THE
TRUSTEES OF COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE
UNIVERSITY, EMORY UNIVERSITY,
GEORGETOWN UNIVERSITY,
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE
DAME DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA,
WILLIAM MARSH RICE UNIVERSITY,
VANDERBILT UNIVERSITY, and YALE
UNIVERSITY,

Defendants.

Case No. 1:22:cv-00125

**JOINT MOTION TO EXTEND TIME TO FILE AMENDED COMPLAINT
AND RESPOND TO COMPLAINT**

Plaintiffs Sia Henry, Michael Maerlander, Brandon Piyevsky, Kara Saffrin, and Brittany Tatiana Weaver (collectively, “Plaintiffs”) and Defendants Brown University, California Institute of Technology, University of Chicago, the Trustees of Columbia University in the City of New York, Cornell University, Trustees of Dartmouth College, Duke University, Emory

University, Georgetown University, Massachusetts Institute of Technology, Northwestern University, University of Notre Dame Du Lac, the Trustees of the University of Pennsylvania, William Marsh Rice University, Vanderbilt University, and Yale University (collectively, “Defendants”), file this joint motion respectfully requesting an extension to February 15, 2022 for Plaintiffs to file an amended complaint, and to April 15, 2022 for Defendants to respond to Plaintiffs’ operative complaint.

1. On January 9, 2022, Plaintiffs filed their Complaint (ECF 1).
2. Plaintiffs served at least one Defendant on January 10, 2022, such that at least one Defendant’s response is due on January 31, 2022.
3. Defendants have only recently retained counsel, or are in the process of retaining counsel, and are working together to coordinate communications with Plaintiffs’ counsel and Defendants’ responses to the Complaint.
4. Plaintiffs have advised Defendants that they intend to file an amended complaint as a matter of course under Fed. R. Civ. P. 15(a)(1)(A).
5. There have been no previous extensions in this case.
6. Counsel for Plaintiffs and Defendants have conferred, and all parties consent to the requested extensions.
7. Counsel for Defendant Northwestern University are authorized by all Defendants to sign this joint motion on their behalf.

WHEREFORE, for the reasons stated above, the parties respectfully request that the Court enter an order granting an extension up to and including February 15, 2022 for Plaintiffs to

file an amended complaint, and up to and including April 15, 2022 for Defendants to file their answers or otherwise respond to Plaintiffs' operative complaint.¹

DATE: January 31, 2022

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Counsel for Plaintiffs

¹ For avoidance of doubt, nothing in the foregoing is intended to waive, or does waive, any defenses available to Defendants, including but not limited to defenses based on lack of personal jurisdiction, improper venue, and inadequate service of process.

/s/ Scott Stein

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*Counsel for Northwestern University and with
the Authorization of All Defendants*

CERTIFICATE OF SERVICE

I, Peter Bach-y-Rita, hereby certify that a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have consented to electronic notification.

/s/ Peter Bach-y-Rita
Peter Bach-y-Rita